

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA Plaintiff, v. DAN RODRIGUEZ LARACUENTE (18) Defendant.	Criminal no. 17-596 (PAD)
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MOTION REQUESTING MODIFICATION OF CONDITIONS OF BAIL RELEASE

TO THE HONORABLE COURT:

Comes now the defendant, Mr. Rodriguez Laracuate, and respectfully states and prays as follows:

1. Mr. Rodriguez Laracuate has been out on bond since pending the resolution of his case and has complied with all conditions of release.

2. Mr. Rodriguez Laracuate wishes to modify his residence pending the conclusion of his case. He will continue to reside with his mother, the current third-party custodian. Mr. Rodriguez Laracuate's' new address is: Urb. Las Lomas, 1674, 28-SW Street, San Juan, P.R. 00921-2438.

3. The undersigned had the current information for over a couple of weeks. Unfortunately, once the COVID-19 pandemic was declared and the Governor ordered all non-essential persons to remain in their homes, it has been very, very difficult period of adjustment. Mr. Rodriguez Laracuate was under the impression that this motion had already been filed.

4. The undersigned was contacted by Mr. Rodriguez Laracuate's' Pre-Trial United States Probation Officer, who inquired about the proposed change of address. The undersigned confirmed Mr. Rodriguez Laracuate's request for modification had been discussed weeks ago with the undersigned.

WHEREFORE, it is respectfully requested that the Court take note of the current information and authorizes the proposed change of residence.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 21st day of April 2020.

I HEREBY CERTIFY, that on this date the present document has been filed electronically and is available for viewing and downloading from the Court's CFM/ECF system by U.S. Attorney's Office.

s/ Diego H. Alcalá Laboy
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